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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RANDOLPH REED,

Defendant.

Case No. 2:25mj378-DAO

COMPLAINT

COUNT I: 18 U.S.C. § 922(g)(1)
Felon in Possession of a Firearm and
Ammunition

Magistrate Judge Daphne A. Oberg

Before Daphne A. Oberg, United States Magistrate Judge for the District of Utah,
appears the undersigned, who under oath deposes and states:

COUNT I

**18 U.S.C. § 922(g)(1)
(Felon in Possession of a Firearm and Ammunition)**

On or about February 20, 2025, in the District of Utah,

RANDOLPH REED,

defendant herein, knowing he had been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess a firearm, to wit: a Ruger model AR-556 multiple caliber rifle, along with associated ammunition, and the firearm and ammunition were in and affecting commerce; all in violation of 18 U.S.C. § 922(g)(1).

AFFIDAVIT IN SUPPORT OF COMPLAINT AND ARREST WARRANT

Complainant, Travis L. Lemon, being duly sworn, hereby states that this Felony Complaint is based on information obtained through an investigation consisting of the following:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been since January 2006. I am currently assigned to the Salt Lake City Division-Vernal Resident Agency, which is involved with the investigation of crimes that occur on and around the Uintah and Ouray Indian Reservation in northeastern Utah, to include death investigations, assault/aggravated assault, controlled substance investigations, child sexual abuse, firearms act investigations and other violent felonies. I was previously assigned to the San Diego Division-Imperial County Resident Agency (previously known as the El Centro Resident Agency), the Salt Lake City Division-Vernal Resident Agency and to the Tampa Division-Brevard Resident Agency. Throughout these assignments, I have gained experience through training, seminars/classes and everyday work related to the various types of investigations, to include interviewing victims, witnesses and suspects, writing/executing search warrants, processing crime scenes, conducting arrests and being involved in the execution of tactical operation orders. The facts in this affidavit were obtained from information, to include a probable cause statement, reports provided by other officers, investigators and/or witnesses, body-worn camera footage and my own personal observations. This affidavit is intended to merely show there is probable cause for the requested warrant and does not set forth all my knowledge in this matter.

2. On February 20, 2025, at approximately 3AM, Law Enforcement Officers (LEOs) were dispatched to Whiterocks, Utah. The report received stated that an intoxicated male was outside of a residence with a rifle. The report was received via third-party information, with a female stating that a male individual at the residence was “tripping out” and had a gun. LEOs from the Bureau of Indian Affairs (BIA) and the Uintah County Sheriff’s Office (UCSO) subsequently responded to 3600 E 11405 N, Whiterocks, Utah.

3. Upon arrival, BIA observed a male dressed in black and walking around the residence. The male individual was later identified as Randolph Reed (Reed). Reed walked back-and-forth and used a point motion with his hand at random areas. Several swinging motions at the air were observed and a long dark item was seen in one of his hands. Reed continued to walk around the back of the property, with a visual of Reed being lost at times. A spotlight was placed on Reed and a BIA LEO saw what was a long black item (then unidentifiable), but law enforcement was concerned it could be a long gun based on the actions of Reed and the report received. Reed then raised the long black item at a BIA patrol car. This item was later identified as a Honshu brand, katana style sword. Reed also had an unknown black item in his back pocket.

4. Reed was given commands to drop the item (sword) and put his hands up multiple times but did not comply. Reed continued to walk around the property behind the house and pointed at random spots in the area. Reed was repeatedly told to stop and put his hands in the air. It appeared to LEOs that Reed was under the influence of an

unknown drug. Reed talked to the sky and asked if LEOs could see things that were not there.

5. As Reed walked to the back of the house, and, in order to prevent him from going back inside, LEOs approached Reed. Reed refused to comply with orders to drop the item (sword) and a UCSO Deputy indicated that the unknown black item in his back pocket was a magazine. Reed was subsequently tased by BIA after which he began kicking and physically fighting with LEOs while LEOs attempted to take him into custody. Reed was eventually placed into handcuffs. He identified himself as Randolph Reed. Upon being tazed/arrested, the magazine previously observed fell out of Reed's back right pocket, which proved to be a black AR magazine filled with 29 rounds of .300 Blackout ammunition.

6. LEOs went to the back of the house and approximately 20 feet from the house and/or approximately 30 feet from where Reed was taken into custody, a black jacket and a black sweatshirt were on the ground. Another "Honshu" sword, black sword sheath, and an AR style rifle were found under the black jacket, with the AR rifle wrapped in the jacket. Both the sword and AR style rifle appeared to have blood on them. The AR style rifle appeared to have an 11.5 inch barrel, a lower receiver that read "Ruger AR-556" and a marking on the upper receiver with the marking "300 BLK" on the dust cover. The rifle had two magazines taped together and one of the magazines was inside the magazine well of the rifle. The two magazines appeared to be the same style as the magazine found in Reed's back pocket. Upon clearing the firearm, a live round was

ejected from the chamber of the AR rifle. The round inside the rifle appeared to be a .300 Blackout round, which matched the color and appearance of the ammunition found in the magazine retrieved from Reed's back pocket.

7. Reed was subsequently taken to the Uintah Basin Medical Center for a medical clearance. Reed had a large cut on his hand that he appeared to have been bleeding from. After receiving medical attention, Reed was booked into the BIA Corrections Facility, located at the Ute Tribe Justice Center, Fort Duchesne, Utah.

8. Evidence items collected and maintained by BIA include, but are not limited to: a Honshu sword with sheath and red cloth found in Reed's possession; a magazine with 29 rounds of .300 Blackout ammunition from Reed's back pants pocket; a Honshu sword with sheath and blood on it; a Ruger AR rifle serial number 857-12978 with blood on it; firearm accessories (black sling and weapon light), and two magazines taped together, one of which was found in the magazine well of the AR rifle; the magazines contained 54 rounds of .300 Blackout ammunition.

9. Reed's criminal history shows that he has, previous to this incident, been convicted of multiple felonies.

10. Interstate Nexus requests for the Ruger AR-556 rifle and .300 Blackout ammunition were submitted to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). The findings and conclusions from the ATF Reports of Investigation indicate that the rifle was not manufactured in the State of Utah and was transported in interstate

commerce, to include the ammunition, which was not manufactured in the State of Utah and was also transported in interstate or foreign commerce.

11. This incident occurred in Whiterocks, Utah, and is within the Federal District of Utah.

12. Based on the foregoing information, your affiant respectfully requests an arrest warrant be issued for REED for violations of 18 U.S.C. § 922(g)(1), *Felon in Possession of Ammunition and Felon in Possession of a Firearm and/or Ammunition*.

/s/ Travis L. Lemon

TRAVIS L. LEMON

Special Agent

Federal Bureau of Investigation

SUBSCRIBED AND SWORN TO by reliable electronic means this 11th day of April 2025.

Daphne A. Oberg

Honorable Daphne A. Oberg
United States Magistrate Judge

APPROVED AS TO FORM:

FELICE JOHN VITI
Acting United States Attorney

/s/ Sam Pead

SAM PEAD

Assistant United States Attorney